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****Admitted in MA, CT, & CA**

December 20, 2006

Assistant U.S. Attorney Todd Newhouse
U.S. Attorney's Office
1550 Main Street
Springfield, MA 01103

RE: **USA vs. May**
Docket No. 05-30023-MAP

Dear Attorney Newhouse:

I am requesting discovery on behalf of Walter May in the above-entitled matter.

1. All search warrant affidavits, warrants and returns issued in these investigations, including any warrants justifying a search of his property in the United States and in Sri Lanka. Likewise, I am requesting the unsealing of these files.
2. A written list of the names, addresses and qualifications of all experts the government intends to call as witnesses at trial, including but not limited to law enforcement officers, together with all reports made by such experts or, if reports have not been made, a brief description of the opinion and subject matter to which each is to testify.
3. The defendant further requests all information to which he is entitled pursuant to 18 U.S.C. §3500 or Rule 26.2 of the Federal Rules of Criminal Procedure.
4. A copy of all Grand Jury minutes generated from the indictment of the defendant.
5. Copies of any written statements in the possession of the United States Attorney's Office or in the possession of any of the law enforcement

authorities assigned to this case, and the substance of any oral statements, allegedly made by any person who will be called as a witness or has made any statements which are in any way related to the subject matter of this case.

6. A list of all names and addresses of witnesses the Government intends to call at trial.
7. Notice pursuant to 404(b) of all other crimes, wrongs or acts intended to be used at trial including (a) the date, time and place of each crime, wrong, or act; (b) a description of each crime, wrong or act; (c) a list of any documents or other evidence upon which the Government intends to rely to prove each such crime, wrong, or act; and (d) the "special grounds" including the special relevance and probative value for such evidence.
8. The full record of arrests and convictions of any government witness including whether this witness is currently under investigation for any violations of state or federal law.
9. Any promises, rewards and or inducements of any kind including whether or not the Government has requested or authorized the payment of any sums of money any informant or cooperating witness who has agreed to testify for the Government.
10. The record of any law enforcement agency, federal, state or local, which pertain to the criminal activity, arrest and/or conviction of any and all witnesses whom the government intends to call in this case.
11. The defendant requests that the Government preserve for trial any original notes taken by any of its investigating law enforcement and/or ICE agents of any interviews with persons who are or may be witnesses at trial and further requests that these notes be provided to counsel.
12. The defendant requests that the Government provide defense with all Jencks Act materials no less than ninety (90) days before jury selection in this case based on interests of judicial economy.
13. All of the incident reports, logs, notes or record all law enforcement's attempts, specifically but not limited to the ICE agents reports of their investigation of the defendant in Sri Lanka and in the United States. This request includes, but is not limited to, interviews with cooperating witnesses and informants, all reports of surveillance relating to this case, reports of any efforts to introduce informants or undercover agents into the investigation.

14. Describe any attempt, successful or otherwise to take a statement of the defendant, whether in Sri Lanka or in the United States during the course of the investigation. This request includes a list of the date(s), time(s) and place(s) of each such occurrence, and the name(s) of the person(s), including counsel who were present. I am also requesting copies of all reports of these statements.
15. A transcription of ALL tapes of ALL conversations related to the investigation of this matter.
16. Disclosure of confidential informants and other informants, agents and cooperating individuals pursuant to *Roviaro v. United States*, 353 U.S. 53 (1957).
17. All evidence in the possession or control of any Governmental agency, federal, state or local which is arguably favorable or helpful to the accused, including but not limited to any evidence which is impeaching of prospective governmental witnesses.
18. The defendant requests that the Government preserve for trial any original notes taken by any of its investigating law enforcement and/or ICE agents of any interviews with persons, including the defendant and those who are or may be witnesses at trial and further requests that these notes be provided to counsel.
19. The defendant requests a copy of all evidence that are not contraband under the law seized from the computer located at the defendant's home, including all e-mails allegedly made by the defendant.
20. The defendant requests the ability to inspect all evidence seized from the defendant's home and person either in the United States or Sri Lanka. This requests all items seized from any computer found in the defendant's home.
21. The defendant requests all exculpatory evidence including translations of any portions of the Sri Lankan investigations which would exculpate the defendant.
22. The defendant requests all police reports and witness statements translated from the Sri Lankan into English involving the investigation of the charges in Sri Lanka which are related to the case at hand.

23. The derfendant requests an inventory of all items seized in the defendant's home in the United States and all items seized from his person both in the United States and in Sri Lanka.

Thank you in advance for you cooperation. If you have any questions do not hesitate to contact my office.

Very Truly Yours,
/s/ Alan J. Black
Alan J. Black, Esq.

cc: Walter May